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JUL 25 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

July 25, 1995

**VIA HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

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Re: RM-8648 and RM-8653

Dear Mr. Caton:

On behalf of the Harris Corporation-Farion Division ("Harris"), we are filing an original and seven (7) copies of its Reply Comments in the above-referenced matter.

If there are any questions, please communicate with the undersigned counsel.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

*Leonard Robert Raish*

Leonard Robert Raish

Counsel for Harris Corporation-Farion  
Division

LRR:cej  
Enclosures

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

**RECEIVED**  
**JUL 25 1995**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matters of	)	
	)	
(1) Petition for Rulemaking To Allocate the	)	RM-8648
5.1 - 5.35 GHz Band and Adopt Service	)	
Rules for a Shared Unlicensed Personal	)	
Radio Network	)	
	)	
(2) Allocation of Spectrum in the 5 GHz	)	RM-8653
Band To Establish a Wireless Component	)	
of the National Information Infrastructure	)	

To: The Commission

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**REPLY COMMENTS OF THE**  
**HARRIS CORPORATION-FARINON DIVISION**

The Harris Corporation-Farinon Division ("Harris"), through its attorneys, hereby submits Reply Comments to the Comments received by the Commission on RM-8648 and RM-8653. Harris contributed to and concurs with the Reply Comments submitted separately by the Fixed Point-to-Point Communications Section of Telecommunications Industry Association (TIA). Noting this and to avoid duplication, the Reply Comments of Harris below are brief.

While Harris concurs in the concept of using new technologies to better serve the American public along the lines suggested in RM-8648 and RM-8653, a basic issue is efficient and effective management of the radio frequency spectrum resource. The 5 GHz band is "prime" spectrum. The Commission is urged to consider and to standby its practice that "short-hop" microwave systems should be on frequencies at 18 GHz or above. The Apple petition (RM-8653) makes reference to 10-15 kilometer

links. The bands above 18 GHz are ideal for this purpose. Further microwave "hops" of 10-15 kilometers will require transmission powers on spectrum that, in the opinion of Harris, should be coordinated and licensed to avoid mutual interference. The Commission is already doing this for the 18, 23, and 38 GHz bands and manufacturers are producing the equipments.

Harmonization of U.S. spectrum allocations with European spectrum is considered a highly desirable objective and a benefit to U.S. manufacturers. Noting the European HIPERPLAN is in the 5150-5300 MHz band, the Commission is urged to consider taking a similar action in the U.S. This could be accomplished with only an adjustment to the WINFORUM proposal for 5100-5350. There is a difference in that the HIPERPLAN has been allocated 150 MHz in most European countries (apparently only 100 MHz in some countries). For example, the lower band edge could be standardized at 5150 MHz and the upper at 5300 for the Europeans and at 5350 MHz for the U.S.

It seems most apparent that Commission should have considerably more information on the record before undertaking any type of rulemaking actions on the two above cited petitions. In its Reply Comments, TIA concludes the Commission

should initiate a Notice of Inquiry to establish a record. Harris concurs with the TIA conclusion.

Respectfully submitted,

HARRIS CORPORATION-FARINON  
DIVISION

By: Leonard Robert Raish  
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July 25, 1995

## **CERTIFICATE OF SERVICE**

I, Chellestine Johnson, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that copies of the foregoing "Reply Comments" were sent this 25th day of July, 1995, by hand delivery and first-class United States mail, postage prepaid, to:

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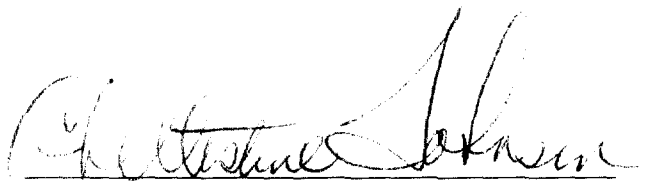
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